



United States Department of the Interior

FISH AND WILDLIFE SERVICE

Ecological Services
Carlsbad Field Office
2730 Loker Avenue West

MAY 19 1998

Mr. John P. Rieger
Environmental Stewardship Branch
California Department of Transportation
District 11
P.O. Box 85406
San Diego, California 92186-5406

Dear Mr. Rieger:

This letter responds to your request for concurrence, pursuant to the National Environmental Policy Act (NEPA) EIS-404 Permit Concurrence Process and MOU, on issues raised in your December 16, 1997, correspondence regarding the Route 78/111 Bypass. The U.S. Fish and Wildlife Service (Service) has reviewed the Alternative Analysis Report for State Route 78/111 Bypass and conducted a site visit on March 24, 1998.

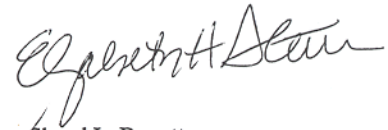
You have requested concurrence on the purpose and need of the proposed project, the criteria for alternative selection, the project alternatives to be evaluated in the EIS, and the listed cooperating agencies. Although it is not our area of expertise, we would be interested in seeing figures that demonstrate the level of traffic increase that necessitates the project before we concur with the project purpose.

The Service agrees with the general criteria used for the evaluation of the alternatives presented in the Alternatives Analysis Report, and offers these comments pertaining to specific evaluation criteria. To evaluate each of the alternatives for environmental impacts, thorough burrowing owl surveys are necessary. The Service recommends mitigation for burrowing owls and their habitat that may be impacted by the proposed project. Examination of the Alternatives map provided in your report indicates that all alternatives cross the New River; therefore, the Service anticipates that each proposed alternative could impact wetland habitats and possibly Yuma clapper rails (*Rallus logirostris yumanensis*) and desert pupfish (*Cyprinodon macularius*). Accordingly, the Service recommends surveys for these species, and their inclusion in the analysis of impacts for each alternative with mitigation measures designed to reduce impacts below a level of significance.

The Service does not oppose any of the alternatives presented in the Alternatives Analysis Report. However, more thorough evaluation is necessary for development of an EIS.

We appreciate the opportunity to comment on the Alternative Analysis Report. If you have any questions, please contact Sandy Vissman, of my staff, at (760) 431-9440.

Sincerely,


for Sheryl L. Barrett
Assistant Field Supervisor